

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CARL E. STEIDTMANN
(OCA/USPS-T2-1-2)
(July 9, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

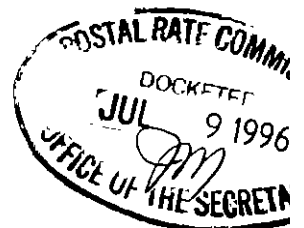
Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney



OCA/USPS-T2-1. In your testimony at 3, you state, "These customers [the large boxholders who are typically businesses] are in turn more likely to request other retail services in conjunction with visits to post offices to retrieve mail."

- a. Have you or the Postal Service conducted a survey or study on the frequency, volume and valuation of transactions for Postal Service retail services among business boxholders and business nonboxholders?
- b. If your response to part "a" of this interrogatory is affirmative, please provide a copy of the survey and the applicable cites. If your response is negative, please indicate the basis for your assertion.
- c. Have you or the Postal Service conducted a survey or study to determine the frequency, volume and valuation of transactions for Postal Service retail services among nonbusiness boxholders and nonbusiness nonboxholders?
- d. If your response to part "c" of this interrogatory is affirmative, please provide a copy of the study with the applicable cites. If your response is negative, please indicate the basis for your assertion.

- e. Please explain how you determined that large boxholders are more likely to request other retail services than small or medium boxholders are.

OCA/USPS-T2-2. In your testimony at 5, you state that

"[s]implifying a product line is worthwhile in a retail context because it generally decreases costs . . . and makes it easier to communicate the value and features of the service to customers."

- a. Please provide all information you have available to you on retailers who "simplify" their product line while raising the remaining product prices. Your response should cite specific product lines as well as specific retailers.
- b. What has been the market impact on those retailers you cite in part "a" of this interrogatory?
- c. When retailers "simplify" their product line, can the simplification process create a potential for another retailer to enter that market and address any potential "void" brought about by the simplification process? Please explain your response.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



DAVID RUDERMAN
Attorney

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